AMENDMENTS TO THE DRAWINGS

The attached sheet(s) of drawings includes new FIGs. 7A-D.

Attachment: 6 Replacement sheets and 1 new sheet.

REMARKS

The drawings have been objected to under 37 C.F.R. 1.83(a) for failing to show every feature of the invention specified in the claims. Applicant has submitted herewith new FIGs. 7A-D without adding new matter, which shows the illumination system of claim 15 with five triangular input light pipes 110, five four faced prism 114 and five sided output light pipe 112. Support for new FIGS. 7A-7D is set forth on paragraph 26 of the specification. Claim 16 has been canceled, thereby obviating this rejection with respect to claim 16. Accordingly, applicant respectfully requests that the objection to the drawings be withdrawn.

Claims 2, 3 and 16 have been canceled.

Claim 11, 23, 24, 26, 27, 32, 41, 42 and 44 have been objected to for various informalities. Claims 11, 23, 24, 26, 27, 32, 41, 42 and 44 have been amended to incorporate the Examiner's kind suggestion. Accordingly, applicant respectfully requests that this objection be withdrawn.

Claims 1-3, 23-25, 39, 42 and 43 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 6,231,199 to Li ("Li"). Claims 2 and 3 have been canceled, thereby obviating the rejection to these claims. Applicant respectfully traverses this rejection with respect to the remaining claims.

The present invention teaches an illumination system which combines the outputs from a plurality of lamps into a single output using a dual paraboloid reflector system comprising a retro-reflector and a dual praboloid reflector. Contrary to the Examiner's assertion, Fig. 3B in Li shows that output from the two lamps are directed to two targets (I, Ia) using a parabolic reflector and is not combined into a single output, as required by

the claims of the present invention. In fact, as shown in Fig. 3B in Li, the outputs from the light sources 31a, 31b are divided into two outputs I, Ia.

Additionally, the Examiner alleges that Li's reflectors 32a, 32b are equivalent to applicant's first light reflectors, and Li's reflectors 35, 35a, 33, 33a are equivalent to applicant's second light reflectors. But, in contrast to the claims of the present invention, as shown in Fig. 3B in Li,

1) the alleged first light reflector 32a reflects light from the light source 31a to both the alleged second reflector 35a or another alleged first reflector 32b, and similarly for the alleged first light reflector 32b;

2) the alleged first light reflectors 32a, 32b can receive the output from both light sources 31a, 31b; and

3) the alleged second reflectors 35, 35a cannot direct light to the alleged output light guides I, Ia, the alleged second reflectors 33, 33a must reflect the light from the alleged second reflectors 35, 35a to the output light guides I, Ia.

Contrary to the Examiner's assertion, Li shows three layers of reflectors directing light to multiple outputs. Applicant respectfully submits that the Examiner cannot use hindsight gleaned from the present invention to reconstruct or modify the prior art reference to render claims unpatentable. Here, the Examiner has gone as far as to change the principle of the operation of the reference in his misguided attempt to support his untenable position that the light from a plurality of lamps is combined into a single output using a dual paraboloid reflector system in Li. However, it is well settled that the Examiner cannot change the principle of the operation of the reference or render the reference inoperable for its intended purpose to render the claims unpatentable.

Of course, a rejection based on 35 U.S.C. § 102 as the present case, requires that the cited reference disclose each and every element covered by the claim. Here, Li does not describe combining light output from a plurality of lamps into a single output using a dual paraboloid reflector system, as required in independent claims 1, 23 and 39. *Electro Medical Systems S.A. v. Cooper Life Sciences Inc.,* 32 U.S.P.Q.2d 1017, 1019 (Fed. Cir. 1994); *Lewmar Marine Inc. v. Barient Inc.*, 3 U.S.P.Q.2d 1766, 1767-68 (Fed. Cir. 1987), *cert. denied*, 484 U.S. 1007 (1988); *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 U.S.P.Q.2D 1051, 1053 (Fed. Cir.), *cert. denied*, 484 U.S. 827 (1987). The Federal Circuit has mandated that 35 U.S.C. § 102 requires no less than "complete anticipation ... [a]nticipation requires the presence in a single prior art disclosure of all elements of a claimed invention arranged as in the claim." *Connell v. Sears, Roebuck & Co.*, 772 F.2d 1542, 1548, 220 U.S.P.Q. 193, 198 (Fed. Cir. 1983); *See also*, *Electro Medical Systems*, 32 U.S.P.Q. 2d at 1019; *Verdegaal Bros.*, 814 F.2d at 631.

Therefore, since Li fails to describe all of the elements of recited in claims 1, 23 and 39, it follows that, contrary to the Examiner's assertion, Li does not anticipate or render obvious claims 1, 23 and 39, or any of claims 4-13, 17-22, 24-38 and 40-44 dependent on claims 1, 23 and 39, respectively.

Claims 1, 4-7, 12-13, 17-18, 21-23, 26 and 39-43 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,852,693 to Jeong ("Jeong"). Applicant respectfully traverses this rejection..

Contrary to the Examiner's assertion, Jeong does not or suggest a dual paraboloid reflector system or a first light reflector comprising a retro-reflector and a dual paraboloid reflector to reflect the light from the light source to the second reflector, as required by claim 23 and amended claims 1 and 39. In fact, as shown in Fig. 5 in Jeong, a parabolic reflector 14 reflects the light from the light source 14 to a light pipe 2.

Applicant respectfully submits that the Examiner cannot use hindsight gleaned from the present invention to reconstruct or modify the prior art reference to render claims unpatentable. Here, the Examiner has gone as far as to change the principle of the operation of the reference in his misguided attempt to support his untenable position that the light from a plurality of lamps is combined into a single output using a dual paraboloid reflector system in Jeong. However, it is well settled that the Examiner cannot change the principle of the operation of the reference or render the reference inoperable for its intended purpose to render the claims unpatentable.

Of course, a rejection based on 35 U.S.C. § 102 as the present case, requires that the cited reference disclose each and every element covered by the claim. Here, Jeong does not describe combining light output from a plurality of lamps into a single output using a dual paraboloid reflector system, as required in independent claims 1, 23 and 39.

Therefore, since Jeong fails to describe all of the elements of recited in claims 1, 23 and 39, it follows that, contrary to the Examiner's assertion, Jeong does not anticipate or render obvious claims 1, 23 and 39, or any of claims 4-14, 17--22, 24-38 and 40-44 dependent on claims 1, 23 and 39, respectively.

Claims 8-10 have been rejected under 35 U.S.C. § 103 as being unpatentable over Jeong in view of Li. Claims 19-20 have been rejected under 35 U.S.C. § 103 as being unpatentable over Jeong in view of U.S. Patent 5,842,767 to Rizkin ("Rizkin"). Claims 11, 27-30, 33-34 and 44 have been rejected under 35 U.S.C. § 103 as being unpatentable over Jeong in view of Japanese published application 08-031382 to Matsushita ("Matsushita). Claim 31 has been rejected under 35 U.S.C. § 103 as being unpatentable over Jeong in view of Matsushita and Li. Claims 35-38 have been rejected under 35 U.S.C. § 103 as being unpatentable over Jeong and Matsushita in view of Rizkin. Claims 16 and 32 have been rejected under 35 U.S.C. § 103 as being unpatentable over Li in

view of U.S. Patent 6,341,876 to Moss ("Moss"). Claim 16 has been canceled, thereby obviating the rejection of this claim. Applicant respectfully traverses these rejections with respect to the remaining claims.

Moreover, to establish a prima facie case of obviousness, three basic criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991); MPEP 2143. Here, the Examiner has failed to establish a prima facie case of obviousness because neither Li nor Jeong describe all the claim limitations of independent claims 1, 23 and 39 and thus included in dependent claims 8-11, 19, 20, 27-38 and 44.

"To imbue one of ordinary skill in the art with knowledge of the present invention, when no prior art reference or references of record convey or suggest that knowledge, is to fall victim of the insidious effect of hindsight syndrome, wherein that which only the inventor taught is used against the teacher." *W.L. Gore & Assoc. v. Garlock, Inc.*, 721 F.2d 1540, 1553 (Fed. Cir. 1983). Applicants respectfully submit that the Examiner has failed to establish the basic requirements of a *prima facie* case of obviousness because none of the cited references independently or in combination therewith does not describe a lamp illumination system for combining light output from a plurality of lamps into a single output using a dual paraboloid reflector system, as required in independent claims 1, 23 and 39 and thus included in dependent claims 4-13, 17--22, 24-38 and 40-44.

Applicant acknowledge with appreciation the Examiner's finding that claims 14-15 would be allowable if rewritten in independent form including all of the limitations of the base claim and intervening claims.

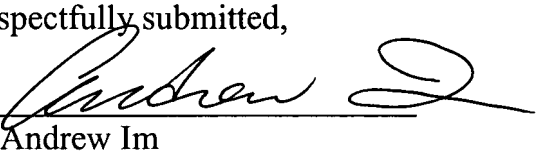
Statements appearing above in respect to the disclosures in the cited references represents the present opinions of the applicant's undersigned attorney and, in the event that the Examiner disagrees with any of such opinions, it is respectfully requested that the Examiner specifically indicate those portions of the reference providing the basis for a contrary view.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 50-0624, under Order No. NY-WAVIEN 221-US from which the undersigned is authorized to draw.

Dated: May 7, 2007

Respectfully submitted,

By 

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Attachments

REPLACEMENT SHEET